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June 3, 2024

SENT VIA ECF ONLY

Hon. Matthew J. Skahill
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *Bruce King v. Camden Iron & Metal, Inc., et al.*
Case No.: 23-4077
Discovery Extension Request

Dear Judge Skahill,

My office represents the Plaintiff in the above-referenced matter. Kindly accept this letter in lieu of a more formal motion in compliance with Your Honor's Policies and Procedures. I write to request an extension to the current discovery deadline.

By way of background, on December 4, 2023, Your Honor entered a Scheduling Order requiring the parties to complete all factual discovery by July 1, 2024. Scheduling Order, ECF No. 19. Since such time, the parties have worked together in good faith to facilitate discovery in this matter. At this juncture, the parties have exchanged written discovery and are working to address any alleged deficiencies. Further, Defendants have already conducted Plaintiff's deposition.

Moreover, the undersigned counsel are attached for trial the week of July 29, 2024 in the Eastern District of Pennsylvania. Plaintiff is also cognizant that Defendants' witnesses may have preplanned, prepaid vacations that may affect our ability to schedule their depositions in the summer months. Plaintiff respectfully requests an extension of the discovery deadline until September 16, 2024 in order to finalize supplemental written discovery as well as depose six (6) of Defendants' witnesses. In conjunction with said request, an extension to the dispositive motion deadline is also requested at Your Honor's discretion. Defendants consent to such request.

Your Honor's time and consideration in this regard is greatly appreciated. If Your Honor has any questions or concerns, please do not hesitate to contact my office.

Respectfully Submitted,

KARPF, KARPF & CERUTTI, P.C.

/s/ *Samantha Pankey Martin*

W. Charles Sipio, Esq.

Samantha Pankey Martin, Esq.

cc: All counsel of record (*via ECF only*)